

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
First-Class Package Service Contract 99 (MC2019-148)
Negotiated Service Agreement

Docket No. CP2019-165

PUBLIC REPRESENTATIVE COMMENTS ON
POSTAL SERVICE NOTICE OF AMENDMENT TO
FIRST-CLASS PACKAGE SERVICE CONTRACT 99

(February 24, 2020)

The Public Representative hereby provides comments pursuant to the Commission's Notice in this docket.¹ In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of Amendment to First-Class Package Service Contract 99.²

The Postal Service's Notice includes a certified statement as required by 39 C.F.R. § 3015.5, a public (redacted) version of the Amendment to First-Class Package Service Contract 99 and supporting financial data estimating the contract value during the first year.

In Order No. 5121, the Commission approved the Postal Service's request to add a new product identified as First-Class Package Service Contract 99 to the Competitive

¹ PRC Notice Initiating Docket No. CP2019-195, February 19, 2020

² Notice of the United States Postal Service of Amendment to First-class Package Service Contract 99, Filed Under Seal. February 18, 2020. (Notice).

Product List.³ The instant Amendment amends the terms in Sections I.B, I.C, I.H, and adds Tables 1a and D to the contract. *Attachment A at 1.*

The effective date for this Amendment to Contract 99 is two (2) business days following the day on which the Commission issues all necessary regulatory approvals. Notice at 1. The contract, as originally filed, was set to expire 3 years from its effective date, unless either party terminated the contract on 30 days' prior written notification, or other specific events. *Id. at 2.*

COMMENTS

The Public Representative has reviewed the Postal Service's Notice of Amendment to First-Class Package Service Contract 99 and the financial data filed under seal with the Postal Service's Notice. Based upon that review, the Public Representative concludes that Contract 99, as amended, should continue to generate sufficient revenues to cover costs and thereby satisfy 39 U.S.C. § 3633(a) and thus should be approved by the Commission.

Finally, the Postal Service must file revenue and cost data for Contract 99 in future Annual Compliance Reports. This data will permit the Commission to review the financial results for First-Class Package Service Contract 99 for compliance with 39 U.S.C. § 3633(a).

³ See Order No. 5121 Order Adding First-Class Package Service Contract 99 to the Competitive Product List, Docket No. MC2019-148/CP2019-165, June 18, 2019.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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